## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ROME DIVISION

IN RE:	)
JANNIE REBECCA TAYLOR,	) CASE NO. 22 – 40850 - PWE
	)
	) CHAPTER 7
DEBTOR.	)

## UNITED STATES TRUSTEE'S MOTION FOR EXTENSION OF TIME TO FILE A MOTION TO DISMISS PURSUANT TO SECTION 707(b)(3) AND OBJECT TO THE DISCHARGE OF THE DEBTOR

Mary Ida Townson, United States Trustee for Region 21, pursuant to Rules 1017(e) and 4004(b) of the Federal Rules of Bankruptcy Procedure, hereby moves the Court to enter an order extending the deadlines for the United States Trustee to file a motion to dismiss pursuant to section 707(b)(3) of the Bankruptcy Code and a complaint objecting to the discharge of the debtor pursuant to section 727 of the Bankruptcy Code. In support thereof, the United State Trustee shows the Court as follows:

1.

On or about July 20, 2022, Jannie Rebecca Taylor (the "Debtor") filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code.

2.

On August 31, 2022, the United States Trustee sent to Debtor, through her attorney, a request for documents and information in connection with the filing of the case. The United States Trustee requested that Debtor produce the requested information by September 14, 2022.

3.

Debtor did not timely respond to the United States Trustee's informal request for documents and information. Finally, on October 26 and 27, 2022, Debtor provided some, but not all of the information previously requested. The United States Trustee is in the process of reviewing the Debtor's information. The United States Trustee believes an examination of the Debtor may be necessary pursuant to Bankruptcy Rule 2004.

4.

Accordingly, the United States Trustee contends that cause exists for an extension of the United States Trustee's deadlines to file a complaint objecting to Debtor's discharge or filed a motion to dismiss pursuant to section 707(b)(3).

WHEREFORE, the United States Trustee respectfully requests the Court to enter an order extending the deadlines for the United States Trustee to file a motion under section 707(b)(3) or a complaint objecting to the Debtor's discharge through and including February 7, 2023.

MARY IDA TOWNSON United States Trustee Region 21

/s David S. Weidenbaum
David S. Weidenbaum
Trial Attorney
Georgia Bar Number 745892

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## CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2022, I caused a copy of the United States Trustee's pleading to be served by electronic mail to ensure to delivery to:

Tracey L. Montz <a href="mailto:tmontztrustee@gmail.com">tmontztrustee@gmail.com</a>, <a href="mailto:tlm@trustesolutions.net">tlm@trustesolutions.net</a>

Dan Saeger on behalf of Debtor Jannie Rebecca Taylor dan@whitfieldcountylaw.com, G64511@notify.cincompass.com

/s David S. Weidenbaum
David S. Weidenbaum